

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DAVID E. MACK,

Plaintiff,

v.

**EQUABLE ASCENT FINANCIAL,
LLC,**

Defendant.

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CASE NO. 4:11-cv-793

PRE-TRIAL DISCLOSURES

**1. The name and, if not previously provided, the address and telephone number
of each witness whom the Defendant expects to present:**

Robert Rodriguez
Director of Analytical Operations
Equable Ascent Financial, LLC
c/o Bush & Ramirez, LLC
5615 Kirby Dr., Suite 900
Houston, Texas 77005
(713) 626-1555

**2. The name and, if not previously provided, the address and telephone number
or each witness whom the Defendant may call if the need arises:**

Keith Wier
Bush & Ramirez, LLC
5615 Kirby Dr., Suite 900
Houston, Texas 77005
(713) 626-1555

**3. The designation of witnesses whose testimony the Defendant expects to
present by deposition**

None. No depositions have been taken in this matter.

4. **An identification of each document or other exhibit, including summaries or other evidence, separately identifying those items the Defendant expects to offer:**

Plaintiff, David E. Mack's Responses to Defendant's First Set of Interrogatories and Request for Production of Documents;

5. **An identification of each document or other exhibit, including summaries or other evidence, separately identifying those items the Defendant may offer if the need arises:**

None.

WHEREFORE, the Defendant respectfully requests that the Court and all parties hereto take notice of the filing of these Pre-Trial Disclosures and for such other and further relief, both at law and in equity to which the Defendant may be justly and legally entitled.

Respectfully submitted,

BUSH & RAMIREZ, LLC

//s// Keith Wier

Keith Wier; SBN: 21436100

Fed. ID No.: 7930

5615 Kirby Dr., Suite 900

Houston, TX 77005

Telephone: (713) 626-1555

Facsimile: (713) 622-8077

**ATTORNEY FOR DEFENDANT,
EQUABLE ASCENT FINANCIAL, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of November, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and provided a copy to Plaintiff by certified mail, return receipt requested as follows:

David E. Mack
7720 McCallum Blvd., #2099
Dallas, TX 75252

via cmrrr # 7010 2780 0002 0702 1159

//s// Keith Wier

Keith Wier